

**From:** Drochak, Terry <DrochaT@wsdot.wa.gov>  
**Sent:** Tuesday, August 04, 2020 11:21 AM  
**To:** Sanga, Ravi <Sanga.Ravi@epa.gov>  
**Cc:** White, Megan <WhiteM@wsdot.wa.gov>; Tarhouni, Yasmine L (ATG) <yasmine.tarhouni@atg.wa.gov>; Mednick, Richard <Mednick.Richard@epa.gov>  
**Subject:** RE: [EXTERNAL] RE: WSDOT Requesting Time Extension - East Waterway Request for Information

Hi Ravi,

Thank you for approving our time extension request.

Terry

**Terry Drochak**

Environmental Compliance Solutions Manager  
Washington State Department of Transportation

Cell: (b) (6)

Email: [Terry.Drochak@wsdot.wa.gov](mailto:Terry.Drochak@wsdot.wa.gov)

**From:** Sanga, Ravi <[Sanga.Ravi@epa.gov](mailto:Sanga.Ravi@epa.gov)>

**Sent:** Tuesday, August 4, 2020 10:21 AM

**To:** Drochak, Terry <[DrochaT@wsdot.wa.gov](mailto:DrochaT@wsdot.wa.gov)>

**Cc:** White, Megan <[WhiteM@wsdot.wa.gov](mailto:WhiteM@wsdot.wa.gov)>; Tarhouni, Yasmine L (ATG)

<[yasmine.tarhouni@atg.wa.gov](mailto:yasmine.tarhouni@atg.wa.gov)>; Mednick, Richard <[Mednick.Richard@epa.gov](mailto:Mednick.Richard@epa.gov)>

**Subject:** [EXTERNAL] RE: WSDOT Requesting Time Extension - East Waterway Request for Information

**WARNING:** This email originated from outside of WSDOT. Please use caution with links and attachments.

Dear Terry

After careful consideration and evaluation, EPA is approving WDOTs request for an extension to EPAs 104 e request. WDOT now has until COB January 31, 2021 to submit to EPA R10 offices, the necessary information in compliance with EPAs 104e request for information on the East Waterway Operable Unit of the Harbor Island Superfund Site.

Please let me know if you have any questions.

Regards,

Ravi Sanga

**From:** Drochak, Terry <[DrochaT@wsdot.wa.gov](mailto:DrochaT@wsdot.wa.gov)>

**Sent:** Tuesday, July 14, 2020 5:37 PM

**To:** Sanga, Ravi <[Sanga.Ravi@epa.gov](mailto:Sanga.Ravi@epa.gov)>

**Cc:** White, Megan <[WhiteM@wsdot.wa.gov](mailto:WhiteM@wsdot.wa.gov)>; Tarhouni, Yasmine L (ATG)

<[yasmine.tarhouni@atg.wa.gov](mailto:yasmine.tarhouni@atg.wa.gov)>; Mednick, Richard <[Mednick.Richard@epa.gov](mailto:Mednick.Richard@epa.gov)>

**Subject:** RE: [EXTERNAL] RE: WSDOT Requesting Time Extension - East Waterway Request for Information

**Importance:** High

Hi Ravi,

I'm just checking in to see if you have had a chance to consider my request and my response below. Please let me know if you have any questions for me.

Thanks and I hope to hear from you very soon.

Terry

**Terry Drochak**

Environmental Compliance Solutions Manager  
Washington State Department of Transportation  
Cell: (b) (6)

Email: [Terry.Drochak@wsdot.wa.gov](mailto:Terry.Drochak@wsdot.wa.gov)

From: Drochak, Terry <[DrochaT@wsdot.wa.gov](mailto:DrochaT@wsdot.wa.gov)>

Sent: Tuesday, July 7, 2020 3:00 PM

To: Sanga, Ravi <[Sanga.Ravi@epa.gov](mailto:Sanga.Ravi@epa.gov)>

Cc: White, Megan <[WhiteM@wsdot.wa.gov](mailto:WhiteM@wsdot.wa.gov)>; Tarhouni, Yasmine L (ATG) <[yasmine.tarhouni@atg.wa.gov](mailto:yasmine.tarhouni@atg.wa.gov)>; Mednick, Richard <[Mednick.Richard@epa.gov](mailto:Mednick.Richard@epa.gov)>

Subject: RE: [EXTERNAL] RE: WSDOT Requesting Time Extension - East Waterway Request for Information

Hello Ravi,

Thanks for your message. The primary reasons we need more time to respond to the information request are related to employee safety, logistics, and financial/budget.

In the best of times (business as usual: adequate funding readily available and accessible, adequate staff readily available and accessible, records readily available and accessible, adequate IT resources available, and no risk of employees contracting and/or spreading COVID-19), we would probably need 3-4 months to respond to an information request like this. WSDOT is a large, decentralized organization comprised of Headquarters, six regions (e.g., Northwest Region, Olympic Region, etc.), and several modes (e.g., Ferries, Aviation, Rail, etc.). It takes time to coordinate and identify the right technical specialty groups, managers, and points of contact within the applicable parts of the WSDOT organization, identify the need for and secure specialty technical consultant support, identify and communicate roles/responsibilities to each office/person, collect and compile the necessary hardcopy and electronic information from various sources in multiple locations, and develop the final product. In this case, we are also coordinating with legal representatives from our Attorney General's Office and their specialized technical consultants, which adds additional cost and complexity to the information request.

In mid-March, around the time we received EPA's information request letter, the COVID-19 pandemic began to significantly impact WSDOT's operations and budget and we expect these impacts to continue into 2021. In mid-March, in an effort to prevent WSDOT

employees from contracting and spreading COVID-19 while at work, nearly all WSDOT staff were directed to telework from home and, as an agency, we were not quite logistically set up to do that effectively. During the first few months, we have encountered numerous logistical and operational challenges to conducting agency business. Our agency has made a number of IT investments over the past few months gradually enabling employees to better communicate and conduct more aspects of our business with each other virtually instead of in person.

Some of the data needed to respond to the information request is in hardcopy format and physically stored in different office locations, which have not been readily accessible to employees for the past several months. Limited employee access restrictions continue but we now have Personal Protective Equipment (PPE) requirements and other safety protocols in place to allow very limited employee access to agency office locations. Other data is in electronic format and is, therefore, more easily accessible from telework locations. Right now, we are working through the logistics of safely accessing and compiling all of the requested data.

The COVID-19 pandemic has also considerably reduced state transportation revenues, which in turn has significantly impacted WSDOT's budget. Our agency is now implementing mandatory employee furloughs from July through November, which have reduced the number of hours each week/month employees can work. Employees working less hours per week has resulted in work tasks taking more calendar days to complete. Our agency has also initiated a hiring freeze, resulting in vacant positions remaining vacant with the work of those vacant positions to be accomplished by other existing employees in addition to their current workloads. Spending and consultant contract restrictions have also been put in place by our agency, which has significantly slowed our ability to fund and execute a specialized technical consultant support contract to help us respond to the information request. We just recently executed a consultant contract to provide the specialized technical support that we need to respond to the information request.

I believe we now have everything in place that we need to respond to the information request, although safety, logistical, and budget challenges to our work will remain for the foreseeable future. For these reasons, it is unlikely that we will be able to conduct our business as quickly as we normally would in the best of times (pre COVID-19).

Thank you for considering our time extension request. Please let me know if you have any more questions. I'd be happy to talk with you via phone or video meeting if you that is necessary.

Terry

**Terry Drochak**

Environmental Compliance Solutions Manager  
Washington State Department of Transportation

Cell: (b) (6)

Email: [Terry.Drochak@wsdot.wa.gov](mailto:Terry.Drochak@wsdot.wa.gov)

**From:** Sanga, Ravi <[Sanga.Ravi@epa.gov](mailto:Sanga.Ravi@epa.gov)>  
**Sent:** Thursday, July 2, 2020 3:09 PM  
**To:** Drochak, Terry <[DrochaT@wsdot.wa.gov](mailto:DrochaT@wsdot.wa.gov)>  
**Cc:** White, Megan <[WhiteM@wsdot.wa.gov](mailto:WhiteM@wsdot.wa.gov)>; Tarhouni, Yasmine L (ATG) <[yasmine.tarhouni@atg.wa.gov](mailto:yasmine.tarhouni@atg.wa.gov)>; Mednick, Richard <[Mednick.Richard@epa.gov](mailto:Mednick.Richard@epa.gov)>  
**Subject:** [EXTERNAL] RE: WSDOT Requesting Time Extension - East Waterway Request for Information

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Hi Terry Thanks for this message. Can you provide me with a bit more information regarding why you need until end of January 2021 ? That seems like an excessive amount of time. Are the records that WDOT needs to access, inaccessible ?

**From:** Drochak, Terry <[DrochaT@wsdot.wa.gov](mailto:DrochaT@wsdot.wa.gov)>  
**Sent:** Thursday, July 02, 2020 7:49 AM  
**To:** Sanga, Ravi <[Sanga.Ravi@epa.gov](mailto:Sanga.Ravi@epa.gov)>  
**Cc:** White, Megan <[WhiteM@wsdot.wa.gov](mailto:WhiteM@wsdot.wa.gov)>; Tarhouni, Yasmine L (ATG) <[yasmine.tarhouni@atg.wa.gov](mailto:yasmine.tarhouni@atg.wa.gov)>  
**Subject:** WSDOT Requesting Time Extension - East Waterway Request for Information  
**Importance:** High

Hello Ravi,

In response to the letter from EPA to WSDOT (General Notice/PRP/104(e) letter), received by WSDOT on March 10, 2020, I am requesting an approximately 6 month time extension to respond to the request for information.

Due to the ongoing COVID-19 pandemic and all of the difficult and unforeseen impacts resulting from it (extended stay at home orders, furloughs, budget cuts, etc.), WSDOT will need considerably more time to respond to this information request. Therefore, **we are requesting a new deadline of January 31, 2021 to provide the requested information to EPA.**

Thank you for considering our request for additional time.

Terry

**Terry Drochak**  
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